

TITLE 326 AIR POLLUTION CONTROL BOARD

LSA Document #06-603

SUMMARY/RESPONSE TO COMMENTS FROM THE SECOND COMMENT PERIOD

The Indiana Department of Environmental Management (IDEM) requested public comment from July 16, 2008, through August 15, 2008, on IDEM's draft rule language. IDEM received comments from the following parties:

Improving Kids' Environment (IKE)

Following is a summary of the comments received and IDEM's responses thereto.

Comment: Emissions of volatile organic compounds (VOCs) from automobile refinishing operations contribute to ozone formation and can include air toxics. IKE is a not for profit organization based in Central Indiana that seeks to reduce environmental threats to children's health, including air pollution.

IKE is fully supportive of IDEM's proposal to extend the existing requirements for automobile refinishers that are now effective in only four counties to the rest of the state. The current rule is a great example of pollution prevention, because it results in lower emissions of VOCs and air toxics, thus improving air quality and saving companies money and materials. The work practice and equipment standards required by this rule represent current best practices for these types of operation, are already in use by many companies, and therefore should not impose an undue burden on the businesses affected. Because ozone is a regional pollutant and because reducing air toxics where ever they are emitted is beneficial to public health, it is prudent to require these work practices throughout the state and thereby provide greater health protection for Indiana residents. (IKE)

Response: IDEM is cognizant of the importance in addressing the ozone issue from a regional perspective. Extending the automobile refinishing rules to all Indiana counties will contribute to a regional control of VOCs that will assist many counties in their efforts to reach and maintain attainment for the 8-hour ozone standard.